

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**CIERRA ROUSSEAU-DOBARD AND  
MICHAEL DOBARD, INDIVIDUALLY AND  
ON BEHALF OF THEIR MINOR CHILDREN,  
BRITTANY HARRIS, NICOLE JONES,  
CHELSI NORA, INDIVIDUALLY AND ON  
BEHALF OF HER MINOR CHILD, AND  
BEVERLY WILLIAMS, ON BEHALF OF  
THEMSELVES AND ALL OTHER  
SIMILARLY SITUATED**

**Plaintiffs,**

**VERSUS**

**MOF-PRESERVATION OF AFFORDABILITY  
CORP., MOF-WILLOWS, LLC, PAC  
HOUSING GROUP, LLC, GMF-PARC  
FONTAINE, LLC  
and HOUSING AUTHORITY OF NEW  
ORLEANS**

**Defendants.**

CIVIL ACTION NO. 2:23-CV-01433

JUDGE BARRY W. ASHE

MAG. JUDGE DONNA PHILLIPS  
CURRAULT

**FIRST AMENDED AND SUPPLEMENTAL CLASS ACTION COMPLAINT**

NOW INTO COURT, through undersigned counsel, come Plaintiffs, Cierra and Michael Dobard, et al, who, on behalf of themselves and all others similarly situated, respectfully aver as follows:

1.

Made additional Plaintiffs herein:

1. Adrianna Jackson (“Ms. Jackson”), a person of the full age of majority domiciled in New Orleans, Louisiana, and a representative of the plaintiff class;
2. Amy Toledano (“Ms. Toledano”), a person of the full age of majority domiciled in New Orleans, Louisiana, and a representative of the plaintiff class;

3. Erica Toledano (“Ms. Erica Toledano”), a person of the full age of majority domiciled in New Orleans, Louisiana, and a representative of the plaintiff class;
4. Elise Felix (“Ms. Felix”), a person of the full age of majority domiciled in New Orleans, Louisiana, and a representative of the plaintiff class;
5. Gladys Dedrick (“Ms. Dedrick”), individually and on behalf of her deceased sister, Kimberly Delay, a person of the full age of majority domiciled in New Orleans, Louisiana, and a representative of the plaintiff class;
6. Jasmine Randall (“Ms. Randall”), a person of the full age of majority domiciled in New Orleans, Louisiana, and a representative of the plaintiff class;
7. Marvette Johnson (“Ms. Johnson”), a person of the full age of majority domiciled in New Orleans, Louisiana, and a representative of the plaintiff class;
8. Leotis Johnson (“Mr. Johnson”), a person of the full age of majority domiciled in New Orleans, Louisiana, and a representative of the plaintiff class;
9. Tashane Gordon (“Ms. Gordon”), a person of the full age of majority domiciled in New Orleans, Louisiana, and a representative of the plaintiff class;
10. Tierra Slack (“Ms. Slack”), a person of the full age of majority domiciled in New Orleans, Louisiana, and a representative of the plaintiff class;
11. Winifred Boyd (“Ms. Boyd”), a person of the full age of majority domiciled in New Orleans, Louisiana, and a representative of the plaintiff class; and
12. Brittany Williams (“Ms. Brittany Williams”), a person of the full age of majority domiciled in New Orleans, Louisiana, and a representative of the plaintiff class.

2.

Plaintiffs re-allege and re-affirm all allegations set forth in their original Petition as if copied herein, in extenso.

**WHEREFORE**, Lead Petitioners, Cierra and Michael Dobard, individually and on behalf of their minor children, Brittany Harris, Nicole Jones, Chelsi Nora, Beverly Williams, Adrianna Jackson, Amy Toledano, Erica Toledano, Elise Felix, Gladys Dedrick, individually and on behalf of her deceased sister, Kimberly Delay, Jasmine Randall, Marvette Johnson, Leotis Johnson, Tashane Gordon, Tierra Slack, Winifred Boyd, and Brittany Williams, on behalf of themselves and those similarly situated, pray that after due proceedings, there be judgment in Petitioners' favor against MOF-Preservation of Affordability Corp., MOF-Willows, LLC, PAC Housing Group, LLC, and GMF-Parc Fontaine, LLC in a reasonable amount to be determined by the premises herein, with interest from the date of judicial demand, plus any other relief provided by law, including reasonable attorney's fees, penalties and costs.

Respectfully submitted,

**CHEARDY SHERMAN WILLIAMS  
RECILE & HAYES, LLP**

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*and*

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing will be sent to counsel for defendant(s) via the Court's Electronic filing system on this 4th day of August, 2023.

**/s/Jacob D. Young**